

EXHIBIT N

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PATRICIA HARAN,

Plaintiff,

-against-

ORANGE BUSINESS SERVICES INC.,

Defendants.

Case No.: 1:21-cv-10585 VSB

**PLAINTIFF’S OBJECTIONS AND RESPONSES TO DEFENDANT’S FIRST
SET OF INTERROGATORIES**

Plaintiff Patricia Haran (“Plaintiff”) for her Objections and Responses to Defendant’s First Set of Interrogatories, by and through her undersigned attorneys, Fisher Taubenfeld LLP, hereby states as follows:

GENERAL OBJECTIONS, COMMENTS AND QUALIFICATIONS

Plaintiff makes the objections and answers contained herein without waiver of any right or privilege to object to the introduction in evidence, in this or any other action or proceeding, of any information contained herein or in any of the documents or the introduction of any of the documents themselves, upon the grounds of competency, relevancy, hearsay, lack of foundation, authenticity or any other proper ground.

The information contained here in and the documents furnished herewith have been compiled based on information currently known to Plaintiff. Plaintiff reserves the right to supplement these answers if, and when, appropriate.

INTERROGATORY NO. 8

Identify each employee, agent, or representative of Defendant who you purport subjected you to discrimination or retaliation.

RESPONSE

Adam Kimmick and Eddy Youhanna

INTERROGATORY NO. 15

Identify each day off work you took to take your daughter to doctor's appointments and for treatment as alleged in Paragraph 19 of the Complaint.

RESPONSE

Plaintiff recalls taking time off work on the below-listed days. Plaintiff may have taken additional time off work in connection with her daughter's illness. Some of those days may be recorded in the Company's PTO system and other days may have been approved informally by Adam Kimmick but not recorded.

October 14th – half day

October 15th, 2020 – October 19th 2020 – PTO for Plaintiffs daughter's surgery

November 11th, 2020 – PTO for Ms. Haran's doctor's appointment

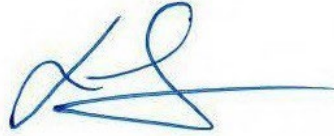
December 18th, 2020 – PTO for doctor's appointment

December 28th, 2020 – PTO for Plaintiff's daughters doctor's appointment

December 30th, 2020 - PTO for Plaintiff's daughters doctor's appointment

February 12th, 2021 – PTO for Plaintiffs mother's doctor's appointment

Plaintiff reserves the right to amend or supplement these responses up to and including trial.

A handwritten signature in blue ink, appearing to be 'Liane Fisher', with a long horizontal line extending to the right.

Dated: July 26, 2022
New York, New York

By: _____
Liane Fisher
FISHER TAUBENFELD LLP
225 Broadway, Suite 1700
New York, New York 10007
(212) 571-0700
ATTORNEYS FOR PLAINTIFF

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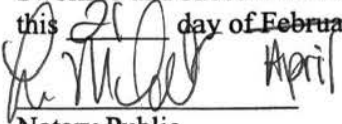
VERIFICATION

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

PATRICIA HARAN, being duly sworn, deposes and says:

1. I am a plaintiff in the above-captioned matter.
2. I have reviewed PLAINTIFF'S OBJECTIONS AND RESPONSES TO DEFENDANT'S FIRST SET OF INTERROGATORIES TO PLAINTIFF.
3. I know the contents of my responses and they are true to my knowledge or to the best of my information and belief.

Sworn to and subscribed before me
this 21 day of February 2023


Notary Public

Lauran Margaret D'Agostino
Notary Public, State of New York
No. 01025057853
Qualified in Suffolk County
Commission Expires April 30, 2023


PATRICIA HARAN